1503 Lake Road Ontario, New York 14519-9364 585.771.3000



October 18, 2004

Mr. Robert L. Clark
Office of Nuclear Regulatory Regulation
U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D.C. 20555-0001

Subject:

Change in CREATS Modification Control Room HVAC Refrigerant Charge

R.E. Ginna Nuclear Power Plant

Docket No. 50-244

References:

1. Letter from Robert C. Mecredy (RG&E) to Robert L. Clark (NRC) dated May 21, 2003, License Amendment Request Regarding Revision of Ginna Technical Specification Sections 1.1, 3.3.6, 3.4.16, 3.6.6, 3.7.9, 5.5.10, 5.5.16, and 5.6.7 Resulting From Modification of the Control Room Emergency Air Treatment System and Change in Dose Calculation Methodology to Alternate Source Term.

2. American Society of Heating Refrigerating and Air-Conditioning Engineers (ASHRAE) Standard, ANSI/ASHRAE Standard 15-2001, Safety Standard for Refrigeration Systems.

Dear Mr. Clark:

In Attachment 2 of Reference 1, R.E. Ginna Nuclear Power Plant, LLC (formerly RG&E) stated that "Each new CREATS cooling system circuit will contain ≤ 29.0 pounds of R-22." Subsequent to that submittal, it was determined that each circuit will require a charge of approximately 50 pounds of R-22. This equates to 1.4 pounds per 1000 cubic feet of occupied space, or approximately 15% of the limit shown in Table 1 of Reference 2. Therefore, even with the increased amount of R-22 in the cooling system, the refrigerant charge in the new CREATS cooling system will remain well within the acceptable industry standard. If you have questions regarding the content of this correspondence please contact Mr. Mike Ruby at (585) 771-3572 or Mr. George Wrobel at (585) 771-3535.

Very truly yours,

osepn A. vviday

A003

STATE OF NEW YORK

: TO WIT:

COUNTY OF WAYNE

•

I, Joseph A. Widay, being duly sworn, state that I am Acting Vice President – R.E. Ginna Nuclear Power Plant, LLC (Ginna LLC), and that I am duly authorized to execute and file this response on behalf of Ginna LLC. To the best of my knowledge and belief, the statements contained in this document are true and correct. To the extent that these statements are not based on my personal knowledge, they are based upon information provided by other Ginna LLC employees and/or consultants. Such information has been reviewed in accordance with company practice and I believe it to be reliable.

Subscribed and sworn before me, a Notary Public in and for the State of New York and County of ______, this _/8_ day of ______, 2004.

WITNESS my Hand and Notarial Seal:

SHARON L. MILLER Notary Public, State of New York Registration No. 01MI6017755

Monroe County
Commission Expires December 21, 20

My Commission Expires:

Attachments: None

Cc: Mr. Robert L. Clark (Mail Stop O-8-C2)

Project Directorate I

Division of Licensing Project Management Office of Nuclear Regulatory Regulation U.S. Nuclear Regulatory Commission One White Flint North

One White Flint North 11555 Rockville Pike Rockville, MD 20852

Regional Administrator, Region 1 U.S. Nuclear Regulatory Commission 475 Allendale Road King of Prussia, PA 19406

U.S. NRC Ginna Senior Resident Inspector

Mr. Peter R. Smith New York State Energy, Research, and Development Authority 17 Columbia Circle Albany, NY 12203-6399

Mr. Paul Eddy NYS Department of Public Service 3 Empire State Plaza, 10th Floor Albany, NY 12223

James M. Petro Jr. Counsel, Generation - Nuclear Constellation Energy 750 East Pratt Street, 17th Floor Baltimore, MD 21202